

**FILED**  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA

In Re:

BCE WEST, L.P., et al

Debtors

Chapter 11

Case Nos. 98-12547  
through 98-12570 ECF CGC  
Jointly Administered

FID#38-3196719

ABDUL BOUZEID,

Movant(s)

-vs-

B. C. GREAT LAKES, L.L.C.,

Respondent(s)

WAYNE COUNTY CIRCUIT COURT  
DETROIT, MICHIGAN

DOCKET NO. 97-722013-NP

**MOTION FOR AN ORDER FOR RELIEF  
FROM THE AUTOMATIC STAY**

**TO: HON. CHARLES G. CHASE, II, J.U.S.B.C.**

Abdul Bouzeid, creditor and movant, moves for an order as follows:

1. Debtor B. C. Great Lakes, L.L.C., has filed a petition for relief under Chapter 11 of the U. S. Bankruptcy Code.
2. Movant/Creditor, Abdul Bouzeid, was injured while a patron in a Boston Market Restaurant in Wayne County, Michigan, on July 22, 1996. As a result thereof, a Complaint was filed in the Wayne County Circuit Court on July 22, 1997, naming Boston Market as a Defendant. This Complaint was amended by Order on November 13, 1997, substituting the debtor B. C. Great Lakes, L.L.C. for Boston Market as the named Defendant.
3. During the course of discovery in the Wayne County Circuit Court action, information has been provided by the debtor's attorney indicating that the Defendant/Debtor

was covered by a policy of insurance on July 22, 1996, with the Fireman's Fund Insurance Company carrying policy limits of \$1,000,000.00.

4. In light of the fact that Defendant B. C. Great Lakes, L.L.C., was insured by the Fireman's Fund Insurance Company on the date of the July 22, 1996 incident, movant, Abdul Bouzeid, respectfully requests that the United States Bankruptcy Court enter an Order lifting the automatic stay to the extent of liability coverage provided by the liability insurance policy issued by the Fireman's Fund Insurance Company.

5. Therefore, pursuant to Section 362 of the U. S. Bankruptcy Code, movant prays that this Court enter an Order granting relief to movant Abdul Bouzeid and lifting the automatic stay permitting him to proceed with his liability cause of action in the Wayne County Circuit Court to the extent of liability insurance coverage available to Defendant/Debtor.

By: Elliott R. Perlman  
ELLIOTT R. PERLMAN (P 18793)  
Attorney for Movant Abdul Bouzeid

Dated: July 2, 1999